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Counsel to South Carolina Electric & Gas Company

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:	)	
	)	Chapter 11
	)	
Calpine Corporation, <u>et al.</u> ,	)	Case No. 05-60200 (BRL)
	)	(Jointly Administered)
Debtors.	)	
	)	
	)	
Columbia Energy, LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Adv. Pro. No. 07-1694
	)	
South Carolina Electric & Gas Company	)	
	)	
Defendant.	)	
	)	
	)	

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**NOTICE OF MOTION OF SOUTH CAROLINA ELECTRIC & GAS  
COMPANY TO WITHDRAW REFERENCE OF ADVERSARY PROCEEDING**

**PLEASE TAKE NOTICE OF THE FOLLOWING:**

1. South Carolina Electric and Gas Company ("SCE&G"), by and through its undersigned counsel, shall move (the "Motion") before the United States District Court for the Southern District of New York, at a date and time to be set by the Court, for entry of an Order, pursuant to 28 U.S.C. § 157(d), Rule 5011 of the Federal Rules of Bankruptcy Procedure and Rule 5011-1 of the Local Bankruptcy Rules for the Southern District of New York, withdrawing the reference to the United States Bankruptcy Court for the Southern District of New York of the adversary proceeding captioned Columbia Energy LLC v. South Carolina Electric & Gas Company, Adv. Proc. No. 07-1694 (the "Adversary Proceeding"), and for such other and further relief the Court deems just and proper.

2. In support of the relief sought by the Motion, SCE&G shall rely upon the Memorandum of Law in Support of Motion of South Carolina Electric & Gas Company to Withdraw Reference of Adversary Proceeding, the Declaration of Henry E. Delk Jr. in Support of Motion of South Carolina Electric & Gas Company to Withdraw the Reference of Adversary Proceeding, dated May 31, 2007 and the Declaration of Michael J. Templeton in Support of Motion of South Carolina Electric & Gas Company to Withdraw the Reference of Adversary Proceeding, dated May 31, 2007, submitted herewith.

3. A hearing may be held on the Motion on a date and at such time and place as determined by the District Court, pursuant to the Local District Court Rules, and that Notice of such hearing will be provided to the appropriate parties in accordance with the Local District Court Rules.

Dated: June 1, 2007

Respectfully submitted,

/s/ Michael J. Templeton  
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